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September 25, 2013

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

RE: PS Docket No. 07-114, Wireless E911 Location Accuracy Requirements

Dear Ms. Dortch,

This joint letter of support comes from a coalition of national consumer advocacy organizations of, for, and by the deaf and hard of hearing, and a technology access research program with Gallaudet University. The coalition consists of: Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI), Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN), National Association of the Deaf (NAD), Hearing Loss Association of America (HLAA), Association of Late-Deafened Adults, Inc. (ALDA), Cerebral Palsy and Deaf Organization (CPADO), California Coalition of Agencies Serving Deaf and Hard of Hearing (CCASDHH), American Association of the Deaf-Blind (AADB), and Technology Access Program at Gallaudet University (TAP), collectively known as “Consumer Groups and TAP.”

Ensuring reliable access to emergency services is an extremely important concern for Consumer Groups and TAP, and improved location identification technology has the ability to dramatically increase the effectiveness of 9-1-1 for Americans who are deaf or hard of hearing as well as for others who make emergency calls over voice and text. Consumer Groups and TAP express our appreciation to the FCC Public Safety and Homeland Security Bureau for initiating a public workshop to discuss recent developments in the use of wireless technology to contact emergency services. We are hopeful that through the workshop the Commission can start a proceeding to examine the current location accuracy rules and how they should be updated.

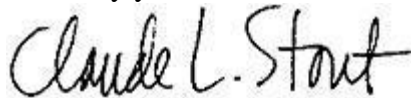
In previous Commission proceedings, we stated our belief that the Commission should ensure consumers are aware of the limitations of current wireless device location technologies, and should do its utmost to facilitate the development and deployment of technologies that could mitigate these limitations. We believe this opportunity exists today.

Current generation location technologies are too often unable to accurately locate callers indoors, especially in multi-level structures. This limitation increases when the size of the structure grows; even when a general street location can be obtained via GPS or from the caller, this information is often insufficient for distressed callers who are in need of assistance from within structures such as apartments, hotels, and office buildings due to the floor locations not being communicated.

Additionally, accurate location information is a very crucial element in 911 response, and the need to locate 911 callers is even more critical in the case of TTY and text-to-911 callers who may be unable to provide their location with the speed or accuracy of traditional voice callers. As we have consistently advocated, text-to-911 will provide a valuable service, but it is crucial that once implemented, it be able to meet customers' expectations and the needs of emergency response personnel.

Through the Commission's Communication Security, Reliability and Interoperability Council ("CSRIC"), we've followed the genesis and advances of next-generation location identification service testing. As the CSRIC reports have noted, various technologies have shown progress in determining the location of a caller with much improved accuracy and reliability, which we believe could provide a significant improvement upon the limitations of the current location accuracy rules. These developments are very compelling and we believe the Commission has a unique opportunity to greatly advance the safety and welfare of the deaf and hard of hearing community as well as the general public by expeditiously initiating a Rulemaking to update the location accuracy rules to reflect what is reasonably achievable today and in the near future. Therefore, we respectfully urge the Commission to do so.

Sincerely yours,



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& Hard of Hearing

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cc:     Acting Chairwoman Mignon Clyburn, Federal Communications Commission  
          Commissioner Jessica Rosenworcel, Federal Communications Commission  
          Commissioner Ajit Pai, Federal Communications Commission  
          Ruth Milkman, Chief, Wireless Telecommunications Bureau, FCC  
          Kris Monteith, Acting Chief, Consumer & Government Affairs Bureau, FCC  
          Karen Peltz-Strauss, Deputy Chief, Consumer & Government Affairs Bureau, FCC  
          Greg Hlibok, Chief, Disability Rights Office, Consumer & Gov't Affairs Bureau, FCC